

EXHIBIT

A



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wileyrein.com

June 10, 2013

Attison L. Barnes, III
202.719.7385
abarnes@wileyrein.com

VIA E-MAIL AND U.S. MAIL

Karl G. Blanke, Esq.
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, Virginia 22030

Re: *Financial Markets International, Inc. v. Booz Allen Hamilton Inc.*,
No. 1:11-cv-1299 (E.D. Va.)

Dear Mr. Blanke:

On behalf of Booz Allen Hamilton Inc. ("Booz Allen"), I write to see if we can amicably agree on a discovery schedule and scope in light of the Court's comments from the bench on June 7, 2013. I believe the Court will expect us to work together in good faith to reach agreement on these matters, keeping in mind that the close of discovery is September 13, 2013.

Although you were not involved in the case at the time, you will see that Booz Allen served its First Interrogatories, Request for Production of Documents and Things, and Requests for Admission on January 17, 2012. FMI served its written responses on February 16, 2012 and, after a meet-and-confer conference, served supplemental responses on March 15, 2012. Because FMI filed the case prematurely, a number of FMI's responses are outdated (among other things, FMI's responses do not include documents and information through the expiration of the Subcontract in December 2012) and require supplementation consistent with your client's continuing duties under the Federal Rules. Indeed, as you were instructed by the Court at the hearing, FMI must provide fulsome information about FMI's employees, labor rates and expenses, profit margin, etc. (see, for example, Interrogatory Nos. 5, 6, and 7 which seek information about all FMI employees who were assigned to FINREP, their salaries, and expenses incurred by FMI in connection with the FINREP project). Moreover, many other interrogatories, document requests, and requests for admission seek information regarding the alleged breach, for which the facts supporting FMI's responses have fundamentally changed in the nearly eighteen months since FMI provided those responses.

FMI served its First Interrogatories, Request for Production of Documents and Things, and Requests for Admission upon Booz Allen on February 6, 2012. Notably, this was one week before the Court dismissed three of the four counts in FMI's complaint. Therefore, Booz Allen objected to a substantial number of these



Karl G. Blanke, Esq.
June 10, 2013
Page 2

requests because they are moot in light of the Court's dismissal of FMI's fraud and misrepresentation claims. Further, certain other requests have since become moot (e.g., because FMI has abandoned its claim for breach of the verification clause). We need to reach some agreement on which of FMI's requests are still viable so that we do not incur needless expenses. We should limit our attention to the issues still in play and set mutually agreeable dates for responses.

To see if we are in agreement on which of your requests are still relevant, please send me an e-mail on or before June 12 identifying those FMI interrogatories, Document Requests, and Admission that you believe are still viable and related to remaining issues in the case, taking into account the following: (1) the Court's dismissal of FMI's fraud and misrepresentation claims; (2) FMI's abandonment of its claim for breach of the verification clause; and (3) any other changed facts or circumstances since FMI's discovery requests were served. We should then have a call to discuss any disagreements. I suggest that we both agree to provide updated responses on July 8, 2013.

I look forward to hearing from you and to setting our schedule going forward.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Attison L. Barnes, III", written over a horizontal line.

Attison L. Barnes, III

EXHIBIT

B

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FINANCIAL MARKETS
INTERNATIONAL, INC.,

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC.,

Defendant.

Case No. 1:11-cv-01299-TSE-JFA

**NOTICE OF DEPOSITION OF JEN BRASWELL PURSUANT TO
RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

TO: JEN BRASWELL

c/o Attison L. Barnes, III
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiff Financial Markets International, Inc. ("Plaintiff" or "FMI"), by its counsel, will take the deposition of JEN BRASWELL, Booz Allen Hamilton, Inc. ("BAH"), at the offices of Financial Markets International, Inc., 818 Connecticut Ave, NW, Washington, DC 20006-2721, or at a mutually agreeable location, commencing on **September 12, 2013 at 2:00 p.m.** The deposition shall be upon oral examination before a properly appointed officer. Plaintiff reserves the right to videotape the deposition.

The deposition will continue from day to day, until completed, and shall be for all purposes authorized by the applicable rules of civil procedure, including discovery, or evidence at any hearing or trial, or both.

Dated: August 27, 2013

By: 

Karl G. Blanke (VSB No. 74691)

Attorney for Financial Markets International, Inc.

The Law Office of Karl G. Blanke, PLLC

4023 Chain Bridge Road, Suite 5

Fairfax, Virginia 22030

Tel: (703) 677-8006

Fax: (703) 890-1493

karl.blanke@blankelaw.com

Anthony Hill, admitted *pro hac vice*

General Counsel

Financial Markets International, Inc.

818 Connecticut Ave, NW

Washington, DC 20006-2721

Tel: (202) 721-0194

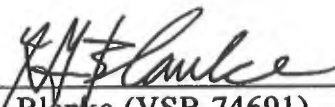
Fax: (202) 721-0198

ahill@fmi-inc.net

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August, 2013 a true and correct copy of the foregoing NOTICE OF DEPOSITION OF NICK KENNEDY PURSUANT TO RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE was served via U.S. mail and electronic mail to the following:

Attison L. Barnes, III
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
abarnes@wileyrein.com
Tel: (202) 719-7000
Fax: (202) 719-7049

By: 
Karl G. Blanke (VSB 74691)
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, VA 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FINANCIAL MARKETS
INTERNATIONAL, INC.,

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC.,

Defendant.

Case No. 1:11-cv-01299-TSE-JFA

**NOTICE OF DEPOSITION OF DONALD PRESSLEY PURSUANT TO
RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

TO: DONALD PRESSLEY

c/o Attison L. Barnes, III
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiff Financial Markets International, Inc. ("Plaintiff" or "FMI"), by its counsel, will take the deposition of Donald Pressley, Senior Vice President, Booz Allen Hamilton, Inc. ("BAH"), at the offices of Financial Markets International, Inc., 818 Connecticut Ave, NW, Washington, DC 20006-2721, or at a mutually agreeable location, commencing on **September 13, 2013 at 9:00 a.m.** The deposition shall be upon oral examination before a properly appointed officer. Plaintiff reserves the right to videotape the deposition.

The deposition will continue from day to day, until completed, and shall be for all purposes authorized by the applicable rules of civil procedure, including discovery, or evidence at any hearing or trial, or both.

Dated: August 27, 2013

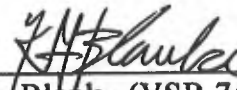
By: 
Karl G. Blanke (VSB No. 74691)
Attorney for Financial Markets International, Inc.
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, Virginia 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

Anthony Hill, admitted *pro hac vice*
General Counsel
Financial Markets International, Inc.
818 Connecticut Ave, NW
Washington, DC 20006-2721
Tel: (202) 721-0194
Fax: (202) 721-0198
ahill@fmi-inc.net

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August, 2013 a true and correct copy of the foregoing NOTICE OF DEPOSITION OF NICK KENNEDY PURSUANT TO RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE was served via U.S. mail and electronic mail to the following:

Attison L. Barnes, III
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
abarnes@wileyrein.com
Tel: (202) 719-7000
Fax: (202) 719-7049

By: 
Karl G. Blanke (VSB 74691)
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, VA 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FINANCIAL MARKETS
INTERNATIONAL, INC.,

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC.,

Defendant.

Case No. 1:11-cv-01299-TSE-JFA

**NOTICE OF DEPOSITION OF WILLIAM PURDY PURSUANT TO
RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE**


TO: WILLIAM PURDY

c/o Attison L. Barnes, III
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiff Financial Markets International, Inc. ("Plaintiff" or "FMI"), by its counsel, will take the deposition of WILLIAM PURDY, Executive Vice President, Booz Allen Hamilton, Inc. ("BAH"), at the offices of Financial Markets International, Inc., 818 Connecticut Ave, NW, Washington, DC 20006-2721, or at a mutually agreeable location, commencing on **September 11, 2013 at 2:00 p.m.** The deposition shall be upon oral examination before a properly appointed officer. Plaintiff reserves the right to videotape the deposition.

The deposition will continue from day to day, until completed, and shall be for all purposes authorized by the applicable rules of civil procedure, including discovery, or evidence at any hearing or trial, or both.

Dated: August 27, 2013

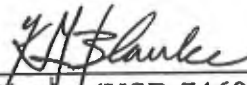
By: 
Karl G. Blanke (VSB No. 74691)
Attorney for Financial Markets International, Inc.
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, Virginia 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

Anthony Hill, admitted *pro hac vice*
General Counsel
Financial Markets International, Inc.
818 Connecticut Ave, NW
Washington, DC 20006-2721
Tel: (202) 721-0194
Fax: (202) 721-0198
ahill@fmi-inc.net

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August, 2013 a true and correct copy of the foregoing NOTICE OF DEPOSITION OF NICK KENNEDY PURSUANT TO RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE was served via U.S. mail and electronic mail to the following:

Attison L. Barnes, III
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
abarnes@wileyrein.com
Tel: (202) 719-7000
Fax: (202) 719-7049

By: 
Karl G. Blanke (VSB 74691)
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, VA 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FINANCIAL MARKETS
INTERNATIONAL, INC.,

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC.,

Defendant.

Case No. 1:11-cv-01299-TSE-JFA

**NOTICE OF DEPOSITION OF KRISTA HODGKINS PURSUANT TO
RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

TO: KRISTA HODGKINS

c/o Attison L. Barnes, III
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiff Financial Markets International, Inc. ("Plaintiff" or "FMI"), by its counsel, will take the deposition of KRISTA HODGKINS, Booz Allen Hamilton, Inc. ("BAH"), at the offices of Financial Markets International, Inc., 818 Connecticut Ave, NW, Washington, DC 20006-2721, or at a mutually agreeable location, commencing on **September 12, 2013 at 9:00 a.m.** The deposition shall be upon oral examination before a properly appointed officer. Plaintiff reserves the right to videotape the deposition.

The deposition will continue from day to day, until completed, and shall be for all purposes authorized by the applicable rules of civil procedure, including discovery, or evidence at any hearing or trial, or both.

Dated: August 27, 2013

By: Karl G. Blanke
Karl G. Blanke (VSB No. 74691)
Attorney for Financial Markets International, Inc.
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, Virginia 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

Anthony Hill, admitted *pro hac vice*
General Counsel
Financial Markets International, Inc.
818 Connecticut Ave, NW
Washington, DC 20006-2721
Tel: (202) 721-0194
Fax: (202) 721-0198
ahill@fmi-inc.net

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August, 2013 a true and correct copy of the foregoing NOTICE OF DEPOSITION OF NICK KENNEDY PURSUANT TO RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE was served via U.S. mail and electronic mail to the following:

Attison L. Barnes, III
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
abarnes@wileyrein.com
Tel: (202) 719-7000
Fax: (202) 719-7049

By: Karl G. Blanke
Karl G. Blanke (VSB 74691)
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, VA 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**FINANCIAL MARKETS
INTERNATIONAL, INC.,**

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC.,

Defendant.

Case No. 1:11-cv-01299-TSE-JFA

**NOTICE OF DEPOSITION PURSUANT TO
RULE 30(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

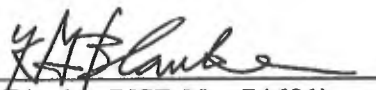
TO: BOOZ ALLEN HAMILTON, INC.

c/o Attison L. Barnes, III
Wiley Rein LLP
1776 K St NW
Washington, DC 20006

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff FINANCIAL MARKETS INTERNATIONAL, INC. ("FMI"), by its counsel, will take the deposition of Defendant BOOZ ALLEN HAMILTON INC. ("Defendant" or "BAH"), by its corporate designee, at the offices of FINANCIAL MARKETS INTERNATIONAL, INC., 818 Connecticut Ave, NW, Washington, DC 20006-2721 , or at a mutually agreeable location, commencing on September 9, 2013 at 2:00 p.m. The deposition shall be upon oral examination before a properly appointed officer. Plaintiff reserves the right to videotape the deposition.

BAH is directed to designate no later than September 4, 2013, one or more authorized representatives to testify on its behalf as to matters known or reasonably available concerning the areas of examination set forth in Schedule A at the place, date, and time specified above. The deposition will continue from day to day, until completed, and shall be for all purposes authorized by the applicable rules of civil procedure, including discovery, or evidence at any hearing or trial, or both.

Dated: August 28, 2013

By: 
Karl G. Blanke (VSB No. 74691)
Attorney for Financial Markets International, Inc.
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, Virginia 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

Anthony Hill, admitted *pro hac vice*
General Counsel
Financial Markets International, Inc.
818 Connecticut Ave, NW
Washington, DC 20006-2721
Tel: (202) 721-0194
Fax: (202) 721-0198
ahill@fmi-inc.net

SCHEDULE A

Definitions

The following Requests are subject to the definitions set forth below:

1. "FMI" or "Plaintiff" shall mean, unless otherwise expressly indicated by the particular context, the named plaintiff, Financial Management International, Inc., and, where appropriate, the officers, agents, employees, servants, representatives, and attorneys of any one or more such person.
2. "Defendant" or "BAH" or "You" or "Your" shall mean, unless otherwise expressly indicated by the particular context, the named defendant, Booz Allen Hamilton Inc., as well as shall include, both collectively and severally, each division, subsidiary, parent, affiliated or related entity of Financial Management International, Inc., any representative, agent, or person acting or purporting to act on behalf of each such person or entity, and any predecessors or successors of any such entity (or predecessors or successors to the subcontract which is the subject matter of this proceeding), and, where appropriate, and its officers, agents, employees, servants, representatives, and attorneys of any one or more such person.
3. "FINREP" shall mean the United State Agency for International Development ("USAID") Ukraine's Financial Sector Rehabilitation Program, Global Business Trade and Investment ("GBTI") Prime No. EEM-I-00-07-00007-00.
4. "FINREP-II" shall mean the USAID/Ukraine Financial Sector Development Program, Solicitation No. SOL-121-12-000004.
5. "Communication" shall mean the transmittal of information in the form of facts, ideas, inquiries, or otherwise.

6. "Complaint" shall mean the Complaint filed by Plaintiff against Defendant in this action and subsequent amendment thereto.

7. "Date" shall mean the exact day, month, and year, if ascertainable, or if not, the best approximation, including the relationship to other events.

8. "Document" is synonymous in meaning and equal in scope to the usage of this term and the term "tangible thing" in the Federal Rules of Civil Procedure. Each comment, or addition to, or deletion from, a document shall constitute a separate document within the meaning of this term. Without limiting the generality of the foregoing, the term "document" shall also include any and all means of conveying, storing, or memorializing information, whether in paper or other tangible physical form, or in electronic form, in the possession, custody, or control of FMI, including, without limitation, computer e-mail.

9. "Employee" shall mean an employee, contractor, or other person paid by or under an entity's direct control and shall include, without limitation, expatriates, third-country nationals, and cooperating country nationals. A person "employed" shall include any employee as defined herein.

10. "LOE" shall mean Level of Effort.

11. The "total dollar value of LOE" shall mean the dollar amount BAH invoiced to USAID for each invoicing (days or portions thereof) of LOE performed.

12. "Person" shall mean any natural person or entity, and shall include, without limitation, individuals, associations, companies, divisions, corporations, partnerships, and any business entities, whether formal or informal.

13. "Scope of Work" or "SOW" shall mean the written description of work to be performed, the number of days of LOE required to perform the work, and any related document that may describe the necessary qualifications of the person to perform the work. This includes any SOW, whether or not distributed or not to all subcontractors, and the SOW ultimately submitted to USAID.

14. "Regarding" means relating or referring to, incorporating, comprising, touching upon, indicating, evidencing, affirming, denying, concerned with, relevant to, or likely to lead to admissible evidence concerning.

15. "Subcontract" shall mean the Subcontract dated December 18, 2009, by and between BAH and FMI for FINREP Task Order EEM-1-03-07-00007-00.

16. The terms "and" as well as "or" should be construed either disjunctively or conjunctively as necessary to bring within the scope of the request any information and documents which might otherwise be construed to be outside its scope. Wherever appropriate herein, the singular form of a word should be interpreted in the plural, and the plural should be interpreted in the singular as necessary to bring within the scope of a request any information and documents which might otherwise be construed to be outside its scope.

17. All words not otherwise defined above shall be interpreted in accordance with their ordinary dictionary definition and the meaning given to them by cases interpreting Virginia law.

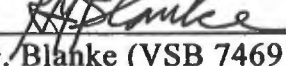
Areas of Examination

1. BAH's registration status in Ukraine during FINREP.
2. The bidding process and communications between USAID and BAH which led to BAH being awarded the FINREP contract.
3. BAH's decision to partner with FMI in pursuing the FINREP contract.
4. BAH's decision to enter into the subcontract with FMI.
5. BAH's drafting and formation of the subcontract with FMI.
6. BAH's role in creating and distributing Scopes of Work for FINREP.
7. The basis for the rise in LOE allocated to FMI from the date of the filing of the Complaint until the completion of the Contract and Subcontract.
8. BAH's role in soliciting, selecting, approving, and filling positions for FINREP, both from its own employees as well as its subcontractors, including but not limited to FMI, Deloitte, Bankworld, and Cardno.
9. BAH's efforts to allocate LOE to FMI.
10. Ann Wallace's performance as Chief of Party for FINREP.
11. Robert Bond's performance as Chief of Party for FINREP.
12. BAH's claim that it met its obligations under the subcontract to allocate a minimum of 35% of the total dollar value LOE to FMI and to make a good faith effort to allocate 40% of the total dollar value LOE to FMI.
13. Personnel that FMI proposed for Scopes of Work that you claim were not qualified to conduct the specific Scopes of Work.
14. BAH's Discovery responses and documents produced in this litigation.

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August, 2013 a true and correct copy of the foregoing NOTICE OF DEPOSITION OF BOOZ ALLEN HAMILTON, INC. PURSUANT TO RULE 30(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE was served via U.S. mail and electronic mail to the following:

Attison L. Barnes, III
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
abarnes@wileyrein.com
Tel: (202) 719-7000
Fax: (202) 719-7049

By: 
Karl G. Blanke (VSB 74691)
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, VA 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FINANCIAL MARKETS
INTERNATIONAL, INC.,

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC.,

Defendant.

Case No. 1:11-cv-01299-TSE-JFA

**NOTICE OF DEPOSITION OF JOHN GLOVER PURSUANT TO
RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

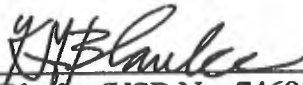
TO: JOHN GLOVER

c/o Attison L. Barnes, III
WileyG Rein LLP
1776 K Street, NW
Washington, DC 20006

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiff Financial Markets International, Inc. ("Plaintiff" or "FMI"), by its counsel, will take the deposition of JOHN GLOVER, Booz Allen Hamilton, Inc. ("BAH"), at the offices of Financial Markets International, Inc., 818 Connecticut Ave, NW, Washington, DC 20006-2721, or at a mutually agreeable location, commencing on **September 11, 2013 at 9:00 a.m.** The deposition shall be upon oral examination before a properly appointed officer. Plaintiff reserves the right to videotape the deposition.

The deposition will continue from day to day, until completed, and shall be for all purposes authorized by the applicable rules of civil procedure, including discovery, or evidence at any hearing or trial, or both.

Dated: August 27, 2013

By: 
Karl G. Blanke (VSB No. 74691)
Attorney for Financial Markets International, Inc.
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, Virginia 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

Anthony Hill, admitted *pro hac vice*
General Counsel
Financial Markets International, Inc.
818 Connecticut Ave, NW
Washington, DC 20006-2721
Tel: (202) 721-0194
Fax: (202) 721-0198
ahill@fmi-inc.net

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August, 2013 a true and correct copy of the foregoing NOTICE OF DEPOSITION OF NICK KENNEDY PURSUANT TO RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE was served via U.S. mail and electronic mail to the following:

Attison L. Barnes, III
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
abarnes@wileyrein.com
Tel: (202) 719-7000
Fax: (202) 719-7049

By: 
Karl G. Blanke (VSB 74691)
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, VA 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FINANCIAL MARKETS
INTERNATIONAL, INC.,

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC.,

Defendant.

Case No. 1:11-cv-01299-TSE-JFA

**NOTICE OF DEPOSITION OF PATRICK RADER PURSUANT TO
RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE**


TO: PATRICK RADER

c/o Attison L. Barnes, III
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiff Financial Markets International, Inc. ("Plaintiff" or "FMI"), by its counsel, will take the deposition of PATRICK RADER, Booz Allen Hamilton, Inc. ("BAH"), at the offices of Financial Markets International, Inc., 818 Connecticut Ave, NW, Washington, DC 20006-2721, or at a mutually agreeable location, commencing on **September 9, 2013 at 9:00 a.m.** The deposition shall be upon oral examination before a properly appointed officer. Plaintiff reserves the right to videotape the deposition.

The deposition will continue from day to day, until completed, and shall be for all purposes authorized by the applicable rules of civil procedure, including discovery, or evidence at any hearing or trial, or both.

Dated: August 27, 2013

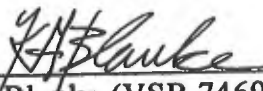
By: 
Karl G. Blanke (VSB No. 74691)
Attorney for Financial Markets International, Inc.
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, Virginia 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

Anthony Hill, admitted *pro hac vice*
General Counsel
Financial Markets International, Inc.
818 Connecticut Ave, NW
Washington, DC 20006-2721
Tel: (202) 721-0194
Fax: (202) 721-0198
ahill@fmi-inc.net

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August, 2013 a true and correct copy of the foregoing NOTICE OF DEPOSITION OF NICK KENNEDY PURSUANT TO RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE was served via U.S. mail and electronic mail to the following:

Attison L. Barnes, III
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
abarnes@wileyrein.com
Tel: (202) 719-7000
Fax: (202) 719-7049

By: 
Karl G. Blanke (VSB 74691)
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, VA 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FINANCIAL MARKETS
INTERNATIONAL, INC.,

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC.,

Defendant.

Case No. 1:11-cv-01299-TSE-JFA

**NOTICE OF DEPOSITION OF JOHN MENNEL PURSUANT TO
RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE**


TO: JOHN MENNEL

c/o Attison L. Barnes, III
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiff Financial Markets International, Inc. ("Plaintiff" or "FMI"), by its counsel, will take the deposition of JOHN MENNEL, Booz Allen Hamilton, Inc. ("BAH"), at the offices of Financial Markets International, Inc., 818 Connecticut Ave, NW, Washington, DC 20006-2721, or at a mutually agreeable location, commencing on **September 10, 2013 at 9:00 a.m.** The deposition shall be upon oral examination before a properly appointed officer. Plaintiff reserves the right to videotape the deposition.

The deposition will continue from day to day, until completed, and shall be for all purposes authorized by the applicable rules of civil procedure, including discovery, or evidence at any hearing or trial, or both.

Dated: August 27, 2013

By: 
Karl G. Blanke (VSB No. 74691)
Attorney for Financial Markets International, Inc.
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, Virginia 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

Anthony Hill, admitted *pro hac vice*
General Counsel
Financial Markets International, Inc.
818 Connecticut Ave, NW
Washington, DC 20006-2721
Tel: (202) 721-0194
Fax: (202) 721-0198
ahill@fmi-inc.net

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August, 2013 a true and correct copy of the foregoing NOTICE OF DEPOSITION OF NICK KENNEDY PURSUANT TO RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE was served via U.S. mail and electronic mail to the following:

Attison L. Barnes, III
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
abarnes@wileyrein.com
Tel: (202) 719-7000
Fax: (202) 719-7049

By: 
Karl G. Blanke (VSB 74691)
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, VA 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FINANCIAL MARKETS
INTERNATIONAL, INC.,

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC.,

Defendant.

Case No. 1:11-cv-01299-TSE-JFA

**NOTICE OF DEPOSITION OF MARK BELCHER PURSUANT TO
RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

TO: MARK BELCHER

c/o Attison L. Barnes, III
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiff Financial Markets International, Inc. ("Plaintiff" or "FMI"), by its counsel, will take the deposition of MARK BELCHER, Booz Allen Hamilton, Inc. ("BAH"), at the offices of Financial Markets International, Inc., 818 Connecticut Ave, NW, Washington, DC 20006-2721, or at a mutually agreeable location, commencing on **September 10, 2013 at 2:00 p.m.** The deposition shall be upon oral examination before a properly appointed officer. Plaintiff reserves the right to videotape the deposition.

The deposition will continue from day to day, until completed, and shall be for all purposes authorized by the applicable rules of civil procedure, including discovery, or evidence at any hearing or trial, or both.

Dated: August 27, 2013

By: 

Karl G. Blanke (VSB No. 74691)

Attorney for Financial Markets International, Inc.

The Law Office of Karl G. Blanke, PLLC

4023 Chain Bridge Road, Suite 5

Fairfax, Virginia 22030

Tel: (703) 677-8006

Fax: (703) 890-1493

karl.blanke@blankelaw.com

Anthony Hill, admitted *pro hac vice*

General Counsel

Financial Markets International, Inc.

818 Connecticut Ave, NW

Washington, DC 20006-2721

Tel: (202) 721-0194

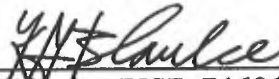
Fax: (202) 721-0198

ahill@fmi-inc.net

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August, 2013 a true and correct copy of the foregoing NOTICE OF DEPOSITION OF NICK KENNEDY PURSUANT TO RULE 30(b)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE was served via U.S. mail and electronic mail to the following:

Attison L. Barnes, III
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
abarnes@wileyrein.com
Tel: (202) 719-7000
Fax: (202) 719-7049

By: 
Karl G. Blanke (VSB 74691)
The Law Office of Karl G. Blanke, PLLC
4023 Chain Bridge Road, Suite 5
Fairfax, VA 22030
Tel: (703) 677-8006
Fax: (703) 890-1493
karl.blanke@blankelaw.com

EXHIBIT

C

From: Karl Blanke <karl.blanke@blankelaw.com>

Date: June 15, 2013, 4:14:49 PM EDT

To: "Barnes III, Attison" <ABarnesIII@wileyrein.com>

Subject: RE: Financial Markets International v. Booz Allen Hamilton Inc.
Attison,

Thank you for your letter dated June 10, 2013. In that letter you have proposed that BAH would produce discovery responses on July 8, 2013, and that FMI would be required to produce any supplemental discovery by that date as well. As you know, FMI has already provided to BAH voluminous discovery in excess of 66,000 pages, consistent with the original discovery schedule in this case. As a result, BAH has had access to FMI's discovery materials for more than a year. By contrast, BAH has provided FMI with virtually no discovery, having only produced:

- 1.) BAH's Objections to Plaintiff's First Set of Interrogatories, BAH's Objections to Plaintiff's First Requests for Admissions, and BAH's Objections to Plaintiff's First Requests for Production of Documents;
- 2.) BAH's Responses to Plaintiff's First Requests for Admissions; and
- 3.) A 42-page privilege log that fails to provide sufficient information for FMI to assess BAH's privilege claims.

Consequently, FMI is at a significant disadvantage, particularly given the impending trial date of October 1, 2013, and discovery cut-off date of September 13, 2013. Given the changed circumstances since Judge Ellis imposed the Stay Order, namely the completion of the Subcontract, I recognize that some of the previously relevant issues in this case have become moot. However, the key issue of what efforts BAH exercised to meet its obligation to reach the good faith goal of 40% of FINREP LOE remains very much alive.

FMI obviously only seeks from BAH information related to the remaining cause of action for breach of contract. Therefore, FMI will forgo the following discovery requests at this time:

- ? Interrogatory No. 1
- ? Interrogatory No. 2
- ? Interrogatory No. 3
- ? Interrogatory No. 4
- ? Interrogatory No. 5
- ? Interrogatory No. 12
- ? Interrogatory No. 15

- ? Document Request No. 4
- ? Document Request No. 5
- ? Document Request No. 6
- ? Document Request No. 7
- ? Document Request No. 8
- ? Document Request No. 9
- ? Document Request No. 10
- ? Document Request No. 22
- ? Document Request No. 26

- ? Document Request No. 29
- ? Document Request No. 32
- ? Document Request No. 33

FMI will, however, maintain the following requests related to the breach of contract claim:

- ? Interrogatory No. 6
- ? Interrogatory No. 7
- ? Interrogatory No. 8
- ? Interrogatory No. 9
- ? Interrogatory No. 10
- ? Interrogatory No. 11
- ? Interrogatory No. 13
- ? Interrogatory No. 14
- ? Interrogatory No. 16
- ? Interrogatory No. 17
- ? Interrogatory No. 18

- ? Document Request No. 1
- ? Document Request No. 2
- ? Document Request No. 3
- ? Document Request No. 11
- ? Document Request No. 12
- ? Document Request No. 13
- ? Document Request No. 14
- ? Document Request No. 15
- ? Document Request No. 16
- ? Document Request No. 17
- ? Document Request No. 18
- ? Document Request No. 19
- ? Document Request No. 20
- ? Document Request No. 21
- ? Document Request No. 23
- ? Document Request No. 24
- ? Document Request No. 25
- ? Document Request No. 27
- ? Document Request No. 28
- ? Document Request No. 30
- ? Document Request No. 31
- ? Document Request No. 34
- ? Document Request No. 35
- ? Document Request No. 36
- ? Document Request No. 37
- ? Document Request No. 38
- ? Document Request No. 39
- ? Document Request No. 40

? Document Request No. 41

I propose that BAH provide complete responses to these outstanding Interrogatories and Document Requests by July 22, 2013 with initial substantive productions commencing no later than June 28, 2013.

Additionally, I propose that any supplemental answers from FMI to BAH's Interrogatories, or supplemental responses from FMI to BAH's Document Requests be due no later than July 22, 2013.

I am currently out of state on military reserve duty and have limited access to email and phone connectivity, but I will try to set up a time to talk if you think it is necessary to work out any additional details. look forward to hearing from you and thank you in advance.

Karl

www.blankelaw.com
(703) 677-8006

-----Original Message-----

From: Barnes III, Attison [mailto:ABarnesIII@wileyrein.com]

Sent: Monday, June 10, 2013 8:55 PM

To: Karl Blanke

Subject: RE: Financial Markets International v. Booz Allen Hamilton Inc.

Karl -

No worries if you are tied up for a few days. Call me when you free up.

Attison L. Barnes, III
Attorney At Law
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
Tel: 202.719.7385 | Fax: 202.719.7049
Email: ABarnes@wileyrein.com
www.wileyrein.com

-----Original Message-----

From: Karl Blanke [mailto:karl.blanke@blankelaw.com]

Sent: Monday, June 10, 2013 8:35 PM

To: Pray, Julie; Barnes III, Attison

Subject: RE: Financial Markets International v. Booz Allen Hamilton Inc.

Attison,

Thank you for your letter. I will write something up and get back to you as quickly as I can. I will aim for a response by the 12th, but I have a heavy schedule over the next several days and may need a bit more time. I will keep you posted.

Karl

www.blankelaw.com
(703) 677-8006

-----Original Message-----

From: Pray, Julie [mailto:JPray@wileyrein.com]
Sent: Monday, June 10, 2013 1:02 PM
To: Karl Blanke
Subject: Financial Markets International v. Booz Allen Hamilton Inc.

Mr. Blanke,

Attison Barnes asked me to forward the attached letter to you. Please contact Mr. Barnes with any questions or comments.

Thank you,

Julie D. Pray | Legal Secretary | Wiley Rein LLP | 1776 K Street NW | Washington, DC 20006
(Tel) 202.719.7085 | (Fax) 202.719.7049 | JPray@wileyrein.com

NOTICE: This message (including any attachments) from Wiley Rein LLP may constitute an attorney-client communication and may contain information that is PRIVILEGED and CONFIDENTIAL and/or ATTORNEY WORK PRODUCT. If you are not an intended recipient, you are hereby notified that any dissemination of this message is strictly prohibited. If you have received this message in error, please do not read, copy or forward this message. Please permanently delete all copies and any attachments and notify the sender immediately by sending an e-mail to Information@wileyrein.com. As part of our environmental efforts, the firm is WILEY GREEN(TM). Please consider the environment before printing this email.

EXHIBIT

D

Capital Reporting Company
Seeger, Charles 08-26-2013 (Excerpt)

1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VIRGINIA
Alexandria Division

-----: :
: :
FINANCIAL MARKETS : :
INTERNATIONAL, INC., : :
: :
Plaintiff, : :
: :
vs. : Case No.
: :
BOOZ ALLEN HAMILTON, INC., : 1:11-cv-01299-TSE-JFA
: :
Defendant. : :
-----: :

Washington, D.C.

Monday, August 26, 2013

Deposition of:

CHARLES SEEGER,

Called for examination by counsel for Defendant,
pursuant to notice, at the Law Offices of Wiley
Rein, 1776 K Street, NW, Washington, D.C., before
Barbara A. Huber of Capital Reporting, CSR, and
Notary Public in and for the District of Columbia,
beginning at 9:33 a.m., when were present on behalf
of the respective parties:

Capital Reporting Company
Seeger, Charles 08-26-2013 (Excerpt)

2

1 A P P E A R A N C E S

2

3 On behalf of Plaintiff:

4 ANTHONY C. HILL, ESQUIRE

5 Financial Markets International

6 818 Connecticut Avenue, NW, Suite 300

7 Washington, D.C. 20006

8 202.721.0194

9 ahill@fmi-inc.net

10

11 On behalf of Defendant:

12 ATTISON BARNES, ESQUIRE

13 Wiley Rein

14 1776 K Street, NW

15 Washington, D.C. 20006

16 202.719.7000

17 abarnes@wileyrein.com

18

19

20

21

22

Capital Reporting Company
Seeger, Charles 08-26-2013 (Excerpt)

43

1 MR. HILL: Objection. Asked and
2 answered.

3 THE WITNESS: I wasn't there.

4 BY MR. BARNES:

5 Q You were based in the United States,
6 not in the Ukraine?

7 A Correct.

8 Q Are you familiar with a subcontract that
9 was signed with Booz Allen Hamilton?

10 A If it's between FMI, yes.

11 MR. BARNES: Let me have that marked,
12 please.

13 (Seeger Exhibit No. 3 marked
14 for identification.)

15 BY MR. BARNES:

16 Q I'm showing you what has been marked as
17 Deposition Exhibit number 3.

18 Is this the subcontract that was entered
19 into between FMI and Booz Allen for the FINREP I
20 program?

21 A Yes.

22 Q And does it show your signature or --

Capital Reporting Company
Seeger, Charles 08-26-2013 (Excerpt)

44

1 A Yes.

2 Q At the last page?

3 A Yes.

4 Q And by your signature, you agreed to the
5 terms in that subcontract?

6 A Yes.

7 Q Did you understand that that subcontract
8 was what's called a time and materials contract?

9 A Yes.

10 Q What do you understand to be a time and
11 materials contract?

12 A You are paid for the amount of time you
13 perform on the contract. And if there are
14 material costs, those are reimbursed.

15 Q So essentially you're paid for the
16 services that you are performed by your people?

17 MR. HILL: Objection as to form.

18 THE WITNESS: Yes.

19 BY MR. BARNES:

20 Q And let me have you look at attachment
21 6.1. It's on page 52.

22 Have you seen that chart before?